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OFFICE OF THE  
EXECUTIVE SECRETARY

**BY OVERNIGHT MESSENGER**

January 7, 2002

Honorable David K. Waddell  
Executive Secretary  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37238

**RE: Docket No. 01-00854 – Universal Telecom, Inc. Formal Complaint  
Against Citizens Telecommunications Company of the Volunteer  
State LLC**

Dear Secretary Waddell:

Below, please find Citizens' responses to the Authority's December 27, 2001 data requests.

**Question 1:**

**Please provide a detailed list of interconnection items or services provided to Citizens Telecommunications Company at a 12% discount pursuant to the Interconnection Agreement between Citizens Telecommunications Company of the Volunteer State, LLC and Citizens Telecommunications Company. Please note if OS/DA is provided with each service or if it is blocked.**

**Answer:** This agreement was entered into on a stand-by basis to be used as needed. To date no items or services have been provided under this agreement.

**Question 2:**

**Please provide a detailed list of items or services that are included in the Interconnection Agreement between Citizens Telecommunications Company of the**

**Volunteer State and Universal Telecom, Inc. Please note if OS/DA is provided with each service or if it is blocked.**

Answer: The following are services that are included in the Interconnection Resale agreement between Citizens Telecommunications Company of the Volunteer State and Universal Telecom, Inc:

Basic Residential Line Service  
Basic Business Line Service  
Public Access Line Service  
Private Line used for special access

Citizens does not provide any blocking including OS/DA and national directory assistance to any of Citizens' own customers or to Universal or any other CLEC interconnecting with CTC of the Volunteer State, with the exception of blocking Directory Assistance Call Completion, which Citizens can and does provide to Universal and Citizens' own customers in the 931 NPA only. Citizens does not offer unbundled OS/DA, since we are not an OS/DA provider in the State of Tennessee.

**Question 3:**

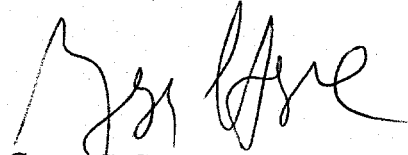
**Under the provision of 47 CFR §51.809, the "Pick and Choose" Rule, is Universal entitled to receive the same discount that is being provided to other carriers including affiliates of Citizens Telecommunications? If so, when will Citizens make this discount available? If not, why not?**

Answer: (1) CTC-VS is prepared to allow Universal Telecom, upon its request, to adopt as a whole and on a prospective basis any other presently effective and TRA-approved interconnection agreement between a CLEC and CTC-VS for the remainder of the term of such agreement. CTC-VS could prepare a contract containing the identical terms and conditions of the other agreement within a few days of Universal's request, if Universal makes such a request. Because such a contract has already been

approved by the TRA with respect to another CLEC, it is CTC-VS's position that it could be made effective as early as the date that is executed by both parties. It would be filed for TRA review and approval.

(2) If Universal desired to "pick and choose" the wholesale discount provided in one of the other agreements and import that discount into Universal's agreement, Universal would be required to accept all other provisions of the other agreement that are "reasonably related" to the wholesale discount. The determination of what is "reasonably related" would be subject to negotiations and if necessary a TRA determination. After the final agreement or determination of what is "reasonably related", CTC-VS would prepare a new agreement or amendment for signature and TRA review. CTC-VS cannot estimate at this time how long this process would require. It is CTC-VS's position that such an agreement or amendment would not become effective prior to TRA approval.

Very truly yours,



Gregg C. Sayre  
Associate General Counsel –  
Eastern Region

GCS:hmj

Enclosures (13 copies for filing)

cc: Edward T. Depp, Esq. - for Universal Telecom, Inc. (by U.S. mail)  
Jonathan N. Wike, Hearing Officer, TN Regulatory Authority (by overnight messenger)